

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

KAREN LASMARIAS, an Individual

Plaintiff,

vs.

UNIVERSITY MEDICAL CENTER OF  
SOUTHERN NEVADA, dba  
UNIVERSITY MEDICAL CENTER, a  
government entity; HELLENE LOPEZ, an  
individual,

Defendants.

**CASE NO.: 2:18-cv-01851-JCM-NJK**

**STIPULATION AND ORDER TO STAY  
DISCOVERY PENDING RESOLUTION  
OF RELATED CRIMINAL MATTER**

**(Fourth Request)**

Pursuant to LR IA 6-1 and 6-2, and pursuant to LR 7-1, Plaintiff Karen Lasmarias (“Plaintiff”), by and through her undersigned counsel; Defendant Hellene Lopez (“Lopez”), by and through his undersigned counsel; and Defendant University Medical Center of Southern Nevada d/b/a University Medical Center (“UMC”), by and through its undersigned counsel; hereby stipulate and agree, and respectfully request that the Court stay all discovery in this action pending the resolution of an ongoing criminal matter arising from the same and/or related allegations to those set forth in Plaintiff’s Complaint in this action. Due to the pendency of the criminal matter in which Lopez is a Defendant, the parties anticipate that Defendant Lopez would be limited in his ability to substantively participate in discovery in this action without either implicating or otherwise being compelled to waive his Fifth Amendment rights.

1 On February 24, 2019, the parties submitted a first request to stay discovery in this matter pending  
2 resolution Lopez' ongoing criminal matter. See Stipulation and Order to Stay Discovery Pending  
3 Resolution of Related Criminal Matter (First Request) [ECF No. 24]. The Court subsequently approved  
4 the stipulation and ordered the stay. See Order [ECF No. 25].

5 On August 19, 2019, the parties submitted a second request to stay discovery in this matter pending  
6 resolution Lopez' ongoing criminal matter. See Stipulation and Order to Stay Discovery Pending  
7 Resolution of Related Criminal Matter (Second Request) [ECF No. 26]. The Court subsequently  
8 approved the stipulation and ordered the stay on August 19, 2019. See Order [ECF No. 27].

9 On October 8, 2019, Lopez' ongoing criminal matter was continued to January 07, 2020.

10 The parties entered a stipulation to continue the stay on Discovery until April 24, 2020 on November 13,  
11 2019. (Third Request) [ECF No. 30]. The Order was entered on November 14, 2019. See Order [ECF  
12 No. 31]. Mr. Lopez' criminal case has now been continued to July 13, 2020. Accordingly, the parties  
13 stipulate and agree, and respectfully request that the Court stay all discovery in this action for an  
14 additional six (6) months pending resolution of the ongoing criminal matter. In the event the criminal  
15 matter is resolved prior to the expiration of the stay, the parties stipulate and agree to promptly notify  
16 this Court of said resolution so that the stay can be lifted and discovery may commence unhindered in  
17 this action. In the event the criminal matter is not resolved within the requested stay period of six (6)  
18 months to **October 24, 2020**, the parties stipulate and agree to coordinate in good faith to request from  
19 this Court any further relief as may be necessary to avoid conflict with the ongoing criminal matter,  
20 including but not limited to, a request to extend the stay. This stipulation is entered into in good faith  
21 and not for the purpose of delay.

22  
23 **IT IS SO ORDERED.**

24  
25   
26 UNITED STATES MAGISTRATE JUDGE

27 Dated: April 27, 2020  
28

1 DATED this 24<sup>th</sup> day of April, 2020

DATED this 24<sup>th</sup> day of April, 2020

2 **MULLINS & TRENCHAK, ATTORNEYS AT**  
3 **LAW**

**HOLLEY DRIGGS WALCH**  
**FINE PUZEY STEIN & THOMPSON**

4 /s/ Philip J. Trenchak

/s/ F. Thomas Edwards

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9  
10 DATED this 24<sup>th</sup> day of April, 2020

DATED this 24<sup>th</sup> day of April, 2020

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12 /s/Jenny L. Foley

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